

# **EXHIBIT A**

**Excerpts from the January 9, 2019 Deposition of Jinping McCormick  
(former Marketing Manager of an Actavis Generic Defendant)**

- “So oxymorphone ER was generic Opana ER. It was first to market, first generic product to enter the market to launch. And so typically we do not do a lot of marketing for generic products because of business model. And this one, we had to do more than so-called typical, *just to make physicians and the pharmacists aware of the introduction of a generic alternative to the brand. So it’s awareness marketing.*” Deposition of Jinping McCormick (“McCormick Dep.”), Dkt. # 1981-4, at 74:15-75:2 (emphasis added).
- “Generic marketing is so much about product management which means to supply -- to make the medicine available, accessible and affordable with good service and supply to the customers . . . *So we used [Kadian sales representatives] just to make the doctors aware that generic products on very select cases was available. They were not detailing any benefit of the -- the medicine.*” *Id.* at 113:1-114:13 (emphasis added).
- “*We have used – occasionally used wholesalers to promote the product*, really in the way to make it aware, really *it’s about awareness that the generic product became available.*” *Id.* at 128:17-21 (emphasis added).
- “So this program is specific to oxymorphone, so that would be our expectation *that’s what this phone campaign would be, to make the pharmacies aware of the availability of the generic oxymorphone ER.*” *Id.* at 149:17-24 (emphasis added).